Case 08-35653-KRH Doc 11427 Filed 11/08/11 Entered 11/08/11 15:42:40 Desc Main Document Page 1 of 4

Paul S. Bliley, Jr., VSB #13973
Williams Mullen
P.O. Box 1320
Richmond, VA 23218-1320
Telephone: (804) 420-6448
Fax: (804) 420-6507
pbliley@williamsmullen.com
Counsel to Williams Mullen Clark & Dobbins

## IN THE UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

IN RE:	) Chapter 11
CID CLUT CITY CHOPPE DIC 1	) Case No. 08-35653 (KRH)
CIRCUIT CITY STORES, INC., et al.,	) Jointly Administered
Debtors.	)

## RESPONSE OF WILLIAMS MULLEN CLARK & DOBBINS TO LIQUIDATING TRUSTEE'S TWENTY-FIFTH OMNIBUS OBJECTION TO CLAIMS (REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS)

Comes now Williams Mullen Clark & Dobbins ("WMCD), the law firm which previously provided legal services to the Debtor, Circuit City Stores, Inc. and for its response to the Liquidating Trustee's Twenty-Fifth Omnibus Objection to Claims, Docket Number 11403, states as follows:

- 1. The Claimant's Name is Williams Mullen Clark & Dobbins, which is a law firm which previously provided legal services to the Debtor prior to its bankruptcy filing.
- 2. WMCD filed a Proof of Claim herein on January 28, 2009, designated as Clalim No. 6757 as an unsecured claim in the amount of \$82,789.25.
- The Trustee's Twenty-Fifth Objection seeks to reduce the WMCD claim to
   \$32,671.00 based upon alleged discounts and payment adjustments dating back to the year 2000.

WMCD objects to this reduction and states that all discounts and adjustments had previously been calculated in the amount filed by its Proof of Claim.

- 4. The personal knowledge of the relevant facts supporting response is Patrick Stewart, an employee of WMCD, whose address is 200 South 10<sup>th</sup> Street, Suite 1600, Richmond, Virginia 23219, telephone number (804) 420-6420 and fax number (804) 420-6507.
- 5. The Bankruptcy Court should overrule the objection to Claim Number 6757, because all credits have been given to the Debtor and no further adjustment is appropriate.
  WMCD intends to introduce documentation to support its claim through its billing records.
- 6. Attached is the Deceleration of Personal Knowledge to the relevant facts that support this response.
- 7. The claimant's address, telephone number, fax number to whom the attorneys for the Trustee should serve a reply to the response served as follows:

Williams Mullen Clark & Dobbins P. O. Box 1320 200 South 10<sup>th</sup> Street Suite 1600 Richmond, VA 23218-1320 Attorney: Paul S. Bliley, Jr. Telephone: (804) 420-6448 Fax: (804) 420-6507

pbliley@williamsmullen.com

8. The name, address, telephone number and fax number of the party to reconcile, settle or otherwise resolve the objection on the claimant's behalf is the attorney set forth above.

Dated: November 8, 2011

WILLIAMS MULLEN CLARK & DOBBINS

By /s/ Paul S. Bliley, Jr. Of Counsel

Paul S. Bliley, Jr., VSB No. 13973 Williams Mullen P.O. Box 1320 Richmond, VA 23218-1320

Phone:

(804) 420-6448

Fax:

(804) 420-6507

pbliley@williamsmullen.com

Counsel for Williams Mullen Clark & Dobbins

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 8<sup>th</sup> day of November, 2011, I caused a copy of the foregoing to be served by electronic means on the "2002" and "Core" lists and through the ECF system.

> /s/ Paul S. Bliley, Jr. Paul S. Bliley, Jr.

16263277\_1.DOC

## **DECLARATION**

I have personal knowledge on behalf of Williams Mullen Clark & Dobbins as to the relevant facts in support of the response of Williams Mullen Clark & Dobbins to the Twenty-Fifth Omnibus Objection filed by the Liquidating Trustee. The Court should overrule the objection as to the claim of Williams Mullen Clark & Dobbins factually and legally.

The legal basis for the overruling of the Objection is that all credit, price adjustments due to the Debtor were factored in and credited to the sums credited to the amounts filed in the Proof of Claim in this case. The funds evidenced by the Proof of Claim filed herein are due and payable by the Debtor in full.

WILLIAMS MULLEN CLARK & DOBBINS

Patrick Stewart

16263277\_1.DOC